



Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

0070237

JUL 13 2006

06-AMCP-0250

Mr. Nicholas Ceto, Program Manager  
Office of Environmental Cleanup  
Hanford Project Office  
U.S. Environmental Protection Agency  
309 Bradley Boulevard, Suite 115  
Richland, Washington 99352

RECEIVED  
JUL 24 2006

EDMC

Ms. Jane Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Addressees:

PROPOSED MODIFICATION TO HANFORD FEDERAL FACILITY AGREEMENT AND  
CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-015-44B, "SUBMIT  
200-MW-1 MISCELLANEOUS WASTE GROUP FEASIBILITY STUDY (FS) AND PROPOSED  
PLAN (PP)"

The purpose of this letter is to document a planning and implementation issue that impacts the ability of the U.S. Department of Energy, Richland Operations Office (RL) to meet Tri-Party Agreement Interim Milestone M-015-44B to submit the FS/PP for the 200-MW-1 Miscellaneous Waste Group Operable Unit (OU), by April 30, 2007.

Unexpectedly high contamination levels encountered during drilling at the 216-A-4 borehole required the development of an alternate approach to remedial investigation (RI) of the waste site. A new path forward has been identified that includes high-resolution resistivity and geophysical logging of the area. Based on the information gained from these activities, RL is recommending a new borehole be installed at the 216-A-4 Crib to complete the requirements specified in the 200-MW-1 Miscellaneous Waste Group OU RI/FS Work Plan (DOE/RL-2001-65) and to concurrently gain additional understanding of the high-resolution resistivity results for that area. Beyond the borehole, further evaluation may be required to gain a broader understanding of the area south of the Plutonium-Uranium Extraction Plant (PUREX). Impacts to the scope, schedule, and budget have not been assessed should additional information be required for the waste sites south of PUREX.

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An approved sampling and analysis plan (SAP) is needed before drilling of the 216-A-4 borehole. The time required to gain approval of the SAP, to plan for the borehole, to obtain characterization data from the borehole, and to conduct the evaluations necessary for the 216-A-4 Crib in the FS, does not support completion of the FS and PP for the 200-MW-1 OU by the current due date of April 30, 2007.

Therefore, RL hereby transmits the enclosed Tri-Party Agreement Change Request to delay Milestone M-15-44B until February 29, 2008, for approval. This request for delay results from conditions beyond the control of RL and Fluor Hanford, Inc. and meets the requirements of Tri-Party Agreement Article XL, "Good Cause for Extensions," and Article XLVII, "Force Majeure."

The extension of Interim Milestone M-15-44B has been included in the technical discussions related to broader scope M-15-00 changes. Because the M-15-00 change process is taking longer than anticipated, RL recommends concurrent processing of this change request to reduce the risk of missing the near-term milestone if M-15-00 discussions continue for an extended period of time.

Concurrent with processing of the enclosed change request, RL is working with the U.S. Environmental Protection Agency to gain approval of the separate 216-A-4 SAP. Planning and pre-job implementation activities for the replacement borehole are underway with completion of drilling anticipated this fiscal year, pending approval of the SAP.

If you have any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klein  
Manager

AMCP:FMR

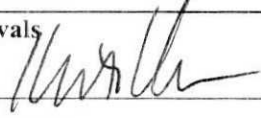
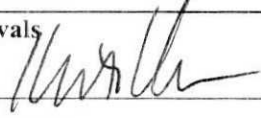
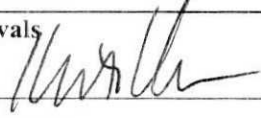
Enclosure

cc w/encl:

C. E. Cameron, EPA  
J. B. Price, Ecology  
Administrative Record  
Environmental Portal

cc w/o encl:

B. A. Austin, FHI  
M. B. Lackey, FHI  
R. D. Morrison, FHI  
R. E. Piippo, FHI

<b>Change Number</b> M-15-06-03	<b>Federal Facility Agreement and Consent Order Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> June 6, 2006												
<b>Originator</b> L. D. Romine, RL		<b>Phone:</b> 509-376-4747												
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager														
<b>Change Title</b> Revise due date for Interim Milestone M-015-44B, Submit 200-MW-1 Operable Unit Feasibility Study (FS) and Proposed Plan														
<b>Description/Justification of Change</b> <p>This change package revises the Interim Milestone M-015-44B date to allow for delays associated with higher than expected contamination levels at the 216-A-4 Crib, which require reevaluation of the remedial investigation (RI) strategy. This request for delay results from conditions beyond the control of the U.S. Department of Energy, Richland Operations Office (RL) and Fluor Hanford and meets the requirements of Tri-Party Agreement Article XL, "Good Cause for Extensions," and Article XLVII, "Force Majeure."</p> <p>RL initiated drilling of a borehole at the 216-A-4 Crib as part of the remedial investigation activities identified in the <i>200-MW-1 Miscellaneous Waste Group Operable Unit RI/FS Work Plan</i> (DOE/RL-2001-65), which was approved by the U.S. Environmental Protection Agency in July 2002. Drilling commenced in July 2004 and was stopped when contamination levels exceeded anticipated levels in the borehole at approximately 23 ft below ground surface. Drilling activities resumed in March 2005 after work planning document changes were made to account for the higher dose rates. Even higher dose rates were encountered and drilling stopped again until May 2005. Activities were subsequently halted to reevaluate the investigation strategy for the 216-A-4 crib due to higher than anticipated contamination levels. TPA Change Notice TPA-CN-147, dated December 27, 2005, acknowledged the delay in obtaining characterization information and authorized deferral of elements related to the 216-A-4 crib and its analogous sites from the Remedial Investigation Report to the Feasibility Study.</p> <p>Additional field characterization activities have since been conducted in the area surrounding the 216-A-4 Crib. High-resolution resistivity surveys and geophysical logging of the area were conducted to support identification of an alternate drilling location for the crib. Based on the information gained from these activities, RL is recommending a new borehole be installed at the 216-A-4 Crib to complete the requirements specified in the <i>200-MW-1 Miscellaneous Waste Group Operable Unit RI/FS Work Plan</i> and to concurrently gain additional understanding of the high-resolution resistivity results for that area. An approved sampling and analysis plan is needed before drilling of the 216-A-4 borehole. The time required to gain approval of the sampling and analysis plan, to plan for the borehole, to obtain characterization data from the borehole, and to conduct the evaluations necessary for the 216-A-4 Crib in the feasibility study does not support completion of the Feasibility Study and Proposed Plan for the 200-MW-1 Operable Unit by the current due date of April 30, 2007.</p> <p>Modifications to Tri-Party Agreement text are displayed as <del>strikeout</del> to indicate text to be deleted and <b>shading</b> to indicate text to be added.</p>														
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">Number</th> <th style="width: 60%;">Milestone</th> <th style="width: 20%;">Due Date</th> </tr> </thead> <tbody> <tr> <td>M-015-44B</td> <td>Submit 200-MW-1 OU Feasibility Study and Proposed Plan</td> <td>4/30/2007 2/29/2008</td> </tr> </tbody> </table>			Number	Milestone	Due Date	M-015-44B	Submit 200-MW-1 OU Feasibility Study and Proposed Plan	4/30/2007 2/29/2008						
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<b>Impact of Change</b> <p>This change does not impact the environment or worker safety and health.</p>														
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order, as amended.														
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="3"><b>Approvals</b></td> </tr> <tr> <td style="width: 30%;">DOE</td> <td style="width: 20%;">   Date <u>7/12/06</u> </td> <td style="width: 50%;"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> <tr> <td>EPA</td> <td> Date _____ </td> <td> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> <tr> <td>Ecology</td> <td> Date _____ </td> <td> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> </table>			<b>Approvals</b>			DOE	 Date <u>7/12/06</u>	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	EPA	Date _____	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	Ecology	Date _____	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
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